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February 21, 2014

VIA HAND DELIVERY

The Honorable Denise L. Cote  
United States District Judge  
United States District Court for the Southern District of New York  
500 Pearl Street, Room 1610  
New York, New York 10007-1312

Re: Request to File Documents Under Seal in *In re Electronic Books Antitrust Litig.*,  
11-MD-2293 (DLC)

Dear Judge Cote:

Pursuant to Your Honor's Individual Practices in Civil Cases, Apple Inc. respectfully submits the following documents for filing under seal in the above-captioned matter:

- Defendant Apple Inc.'s Memorandum of Law in Opposition to Class Plaintiffs' Motion for Summary Judgment;
- Defendant Apple Inc.'s Response to Class Plaintiffs' Statement of Undisputed Facts; and
- Declaration of Cynthia E. Richman and accompanying exhibits, filed in Support of Apple Inc.'s February 21, 2014 Filings.

Apple Inc. seeks to file these documents under seal to the extent they contain material that has not been made publicly available in prior proceedings and has been designated by the parties or third parties as Confidential or Highly Confidential pursuant to the May 9, 2012 Protective Order and November 30, 2012 Supplemental Protective Order in the above-captioned matter.

In accordance with Rule 4A of Your Honor's Individual Practices, we have enclosed with this letter: (1) two courtesy copies of each of the filings in unredacted form, (2) one full copy of each of the filings with Apple's proposed redactions highlighted, and (3) one loose-leaf set

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of only those pages from each filing upon which Apple seeks redactions. Apple has concurrently served Plaintiffs and affected third-parties with these materials.

Respectfully submitted,



Theodore J. Boutrous, Jr.

Encl.

cc: Counsel of Record